

ETEXT ATTACHMENT

12/13/2004 16 : 17

In response to your letter of November 12, 2004 referencing the October Quarterly Report (7/1/04-9/30/04), Schedule E was filed on 8/24/04 for an Independent Expenditure to The Mercury Group in support of Thomas Price. We do agree that we filed this report late; however, Schedule E should have indicated a date of August 6, 2004 rather than July 30, 2004.

While the check to the Mercury Group was issued on 7/30/04, the radio advertising began on 8/5/04. The rules state that the expenditures must be reported on the day following the date on which independent expenditures are publicly distributed or disseminated. We interpret this to mean the date the advertising took place. The purpose of the expenditure should have referenced this date of 8/5/04 as the date on which the independent expenditure was publicly distributed or disseminated. Notwithstanding the above, we are aware that this filing was not made on a timely basis. This occurred during the time of transition in the organization, with the departure of our PAC manager. In addition, as soon as we became aware of this inadvertent clerical error, we submitted the filing of Schedule E along with an explanatory letter to the FEC.